



PRIVACY POLICY

Who we are

iCFD Limited is a member of the iFOREX group and it is registered as a Cypriot Investment Firm (CIF), regulated by the Cypriot Securities and Exchange Commission (CySEC) under license number 143/11.

Our commitment

This Privacy Policy explains how iCFD Limited operating under the brand name iFOREX Europe (formerly known as Vestle) (hereinafter as, “iFOREX Europe”, “WE”, “US”, “Company”) collects, processes and retains personal information about you (i.e. individuals). For the purposes of this Policy, the phrase “personal information” refers to any information relating to you which identifies you or you can be identified by it.

iFOREX Europe is committed to protecting the privacy of all personal information that we obtain. iFOREX Europe handles, retains and processes your information only insofar as this is in accordance with the applicable legal requirements and only to the extent it is necessary for the achievement of the purposes set out herein.

iFOREX Europe contact details

Should you wish to contact us with respect to any matter related to your personal information processed by us and/or to the exercising of your rights under applicable law, please contact our DPO (Data Protection Officer) by email dpo@iforex.eu, or by using the applicable form on the Company’s website, or by mail to iCFD Limited at Corner of Agiou Andreou & Venizelou Streets, Vashiotis Agiou Andreou Building, Second Floor, P.O.B 54216, Limassol, Cyprus.

What information do we collect

In Short: We collect personal information that you provide to us as part of your use of our services.

In order to provide you with our services we need to process certain information about you. We ask for information which enables us to offer and provide you with products and services tailored and customized to your interests and needs. Additionally, when you use our services we collect information from your use of our website, trading platform and mobile app (“Websites”) which helps us to better improve your experience when using our websites and allows us to manage the services we provide.

Personal Information Provided by You

We retain your full name, date of birth, place of birth, address, a certified photocopy of your national ID card, passport or other form of ID and a certified photocopy of a recent utility bill, or other proof of address, TICs (Tax Identification Codes), country of residence, information related to your financial status, such as your bank account/s and Credit Card/s details or other means of payments, the origin of funds, annual income, occupation and information related to your knowledge and experience in the field of which we provide services, phone number and email address. We may retain other types of personal data you decide to share with us as part of any correspondence with you, such as by way of chats and call recordings.

Information automatically collected

We may also retain information automatically when you visit our websites and/or use our services, such as deposits and withdrawals history, information in regards to funds and financial instruments kept by the Company on your behalf,

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relevant data and types of transactions conducted, documents downloaded and/or uploaded, how you use our websites and/or the frequency with which you access these, for example site areas visited, pages viewed and duration of visits, Internet Protocol (IP) address, geo location information, computers and cellular devices identification parameters, general identifiers, your websites' activity as well as text you type there, websites which referred you to ours or to which websites you link and your preferred languages.

Information received by third parties

We may offer you the ability to register and login using your third-party social media account details (like your Facebook, Google etc.). Where you choose to do this, we may receive certain profile information about you from your social media provider that may vary depending on the social media provider concerned, but will often include your name and e-mail address as well as other information you choose to make public in accordance with the terms of agreements and your privacy setting with these services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media or other providers, and any personal data collected by such providers are governed by their privacy policies and related terms. We recommend that you review such privacy policies to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps. We may also receive personal information related to you from identity verification agencies, credit reference agencies and alike and, from open sources which contain publicly available information.

Unsolicited Information

If you provide us with personal information that we have not requested then we will endeavor to only retain the information that we are entitled or required to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain, or that technically is impossible to isolate and delete then you hereby acknowledge that this unsolicited information may be held by us in the same manner as your other personal information.

The purposes for which we process personal information and the legal basis of it

***In Short:** We process your information for purposes based on our legitimate business interests, the fulfillment of our contract with you and compliance with our legal obligations.*

1. Compliance with legal obligations

iFOREX Europe is required to collect, process and retain personal information of its clients in accordance with strict mandatory legal requirements, such as the Anti-Money Laundering law and financial regulations, in order to preform identity checks, including identity confirmation and authentication checks, identifications of political exposed persons (PEPs), including checks with credit reference agencies (who may keep a record of the information), the resource of your funds, to assess your suitability and appropriateness to receive the products and services we provide and in accordance, to categorize you as a client and to manage and administer the products and services that we provide you, and such information as required in order to ensure and evidence our compliance with our legal and regulatory obligations.

2. For the performance of the contract

- (a) In order to provide you with the products and services that you have requested, to maintain and manage your account and personal profile, and in order to contact you when necessary and/or appropriate in relation to the products and services being provided to you, including via third parties, and to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies;
- (b) To enforce the Company's legal framework, i.e. the Company's governing terms and conditions ("T&C") as detailed in the Company's Client Agreement. iFOREX Europe process personal information in order to monitor if its clients use of the Company's products and services is in breach and/or is abusing the governing T&C, including with no limitation, in any case of dispute, or legal proceeding of any kind between iFOREX Europe's clients and iFOREX Europe, or between iFOREX Europe's clients, and other clients or third parties with respect to, or in relation with the services iFOREX Europe provides;
- (c) To fulfill and manage your transactions and payments made as part of our services;
- (d) For preventing fraud and for risk management purposes and as part of our efforts to keep our website and services safe and secure;
- (e) For troubleshooting, to respond to your inquiries and solve any potential issues you might have with the use of our website and/or services.

3. For Our legitimate interests of

- (a) iFOREX Europe processes personal information to enhance its business objectives, such as to, without limitations, measure and understand the effectiveness of advertising and to deliver most relevant advertising to clients and potential ones, including to market our products and services to people like you; to develop better understanding of the products and services our clients and potential clients may be interested in and to optimize and tailor them constantly. This may also include use your information to request feedback and to contact you about your use of our websites and services;
- (b) To maintain adequate administrative and business records relating to our business;
- (c) For the purposes mentioned in sections 2(b) and (d) above;
- (d) To improve our websites to ensure that content is presented in the most effective manner;
- (e) If applicable, to allow clients to participate in interactive features of our service, when they choose to do so;
- (f) To conduct surveys and questionnaires;
- (g) For creating aggregated impersonalized and/or statistical information.

4. Marketing

We use personal information for marketing purposes, such as, without limitations, to always keep our clients up to date in relation to products and services offered by us and/or by our partners, to contracts our clients have traded, to iFOREX Europe's activities etc., by means of emails, SMS (text) messages and/or any other electronic communications as may be applicable.



Should you wish to opt-out from receiving marketing services, at any time, you may do so by following the instructions included in each message, or updating your preferences on the Company's trading platform, or upload a request to iFOREX Europe.

Please note that opting out from marketing services might affect your ability to explore new products and services and their customization to your needs and requirements and, will not prevent completely all forms of communications to you, since iFOREX Europe is required by law to communicate and inform you of legal aspects related to the products and services that we provide you with.

Automated decision – making and profiling

***In short:** we may use automated decisions making tools in order to perform our duties and provide our services to you.*

We use automated decisions making tools to perform our duties and provide our services and products, including for KYC (know-your-client) and CDD (customer due diligence) purposes. We are required by law to process personal information in order to (i) ensure our services are not being used for money laundering and/or terrorist financing and/or fraud purposes; (ii) to establish our clients' suitability and appropriateness to receive our services; (iii) to assure we are acting honestly, fairly and professionally and in the best interests of our clients (iv) in general to assure and evidence as appropriate that we comply with our legal and regulatory obligations. We also use automated decision making and profiling mechanisms for marketing purposes and to customize our products and services to our clients in order to ensure a more personalized, effective and efficient services.

How long will iFOREX Europe retain your personal information?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will keep your personal information for as long as you are a customer of ours, and after you stop being one we will retain your information for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes.

We may retain Personal Information for longer periods than required by law if it is in our legitimate business interests and not prohibited by law or if we cannot delete it due to technical reasons. We may also keep information for research or statistical purposes, in which case under no circumstances will you be able to be identified from this statistical data, you will remain anonymous.

The recipients of personal information

***In Short:** We only share information to comply with laws, to provide you with our products and services, to protect your rights, or to fulfill our business obligations and legitimate interests.*

We may make personal information available to those employees, partners, contractors, professional advisers, affiliates and service providers of iFOREX Europe (including, with no limitation to, parent, sister and subsidiary companies in the iFOREX Group, credit reference and/or fraud prevention agencies, clearers and/or payment service providers, marketing and advertising providers, companies we have a joint venture or agreement to co-operate with, and market researchers) who need to access such information for the purposes described in this policy. Those with access to personal information

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are obligated to comply with strict standards of confidentiality and protection of personal information and other information.

We may also share information with other third parties if we choose to sell, transfer, or merge parts of our business, or our assets or we may seek to acquire other businesses or merge with them. We will only share information with other parties if they agree to keep your information safe and private and which have sufficient guarantees that implement appropriate technical and organizational measures to ensure your rights.

We may share information with law enforcement agencies, information protection authorities, and other competent authorities as well as with other competent third parties, as may be required if we believe that you performed any act or omission that iFOREX Europe believes to be violating any applicable law, rules, or regulations, or if iFOREX Europe is required, or believes that it is required by law to share or disclose your information to applicable authorities or to any other third party, in case of dispute, or legal proceeding of any kind between you and iFOREX Europe or between you and other clients or third parties with respect to, or in relation with the services iFOREX Europe provides and, where iFOREX Europe believes, in its sole discretion, that sharing information is necessary to prevent imminent physical harm or damage to iFOREX Europe or a third party's rights or property.

Transfer of information to third countries

***In Short:** We may transfer, store, and process your information in countries other than your own.*

Your personal information will be transferred by iFOREX Europe to its servers and/or servers of its affiliated companies and/or third-party processors in the EEA (European Economic Area) and/or which some are located in non-EEA jurisdictions which are either approved by the European Commission by an Adequacy Decision and/or amongst others, where we enter into a contract with the recipient in accordance with the applicable laws. We always take the appropriate measures to ensure that your personal information is properly secured.

Consequences of your refusal to provide us with personal information

***In Short:** if you will not be willing to provide us with relevant personal information, we might not be able to provide you with certain services.*

Depending on the type of personal information in question and the grounds on which we may be processing, in some cases should you decline to provide us with personal information, for example as requested in the application form, we may not be able to open an account for you, to fulfil our contractual obligations or to provide you with any other services, information or assistance you have sought, or evaluate the appropriateness of the service you are requesting or may not be able to continue with our relationship.

Your rights

***In Short:** You may review, change, or ask for the deletion of your personal information at any time.*

Your rights are as follows in respect of the personal information we hold about you:

- The right to be informed about processing of your personal information;



- The right to have your personal information corrected if it's inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the "right to be forgotten");
- The right to request access to a copy of your personal information and information about how we process it;
- The right to obtain a copy of personal information in a commonly used and machine-readable format;
- Rights in relation to automated decision-making including profiling.

Please note that we may not be able to fulfil every request. Some of these rights only apply in certain circumstances and may be subject to our regulatory and legal obligations and/or legitimate interests which may override and prevent us from doing so or other exemptions may apply.

Before providing access to you, we will ask you to prove your identity and give us sufficient information about your interaction with us so that we can locate any relevant data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your personal information, and for any additional copies of the personal information you request from us.

Please note that exercising the right of erasure will prevent us from providing you with any further service and, exercising the rights of restriction or the right to object to processing may adversely impair our ability to provide you with any of the products and services you may have requested.

Cookie Policy

To make our websites and services work properly, we sometimes place cookies on your device. Most big websites do this too.

A cookie is a small piece of data (text file) that when visiting our websites we ask your browser to store on your device in order to remember information about you such as a user identification code, customized preferences, or a record of pages visited. Cookies are used to make websites work, or work more efficiently, as well as to provide information such as performance, security, etc. We use first-party cookies, cookies that are set by us, and may also use third-party cookies to support our activities and websites operation, enhancement, advertising and marketing efforts. We use the following types of cookies:

Strictly Necessary Cookies

These cookies are essential for the operation of the websites, their features and for the provision of a secure online environment. Without these cookies certain features and functionality will not be available. These cookies cannot be opted out, for example:

Cookie	Type	Origin	Purpose
Hplang	Strictly necessary	First party	Enable users to reach s website's main domain
Fx_cn	Strictly necessary	First party	Prevents the cookies acceptance strip from continuously being displayed to users in future visits to a website

Functionality and performance cookies

Functionality cookies allow our websites to provide enhanced functionality and personalization such as your choice of preferred language, your region, customization of webpages etc. The information collected is anonymized and does not track your browsing activity across other websites. Performance cookies enable us to count visits and traffic sources to the websites, understand what pages viewed and which are the most and least popular and, how visitors navigate the websites. The information is anonymous and is used to improve the websites performance and users experience. Opting out these cookies may affect your browsing experience. These cookies may be set by us or by third party providers, for example:

Cookie	Type	Origin	Purpose
_test	Performance	First party	Used for A/B testing for improving a website's functionality
_vwo	Performance	Third party (VWO)	Used for advanced website traffic analysis and AB testing
_ga & _gat	Performance	Third party - Google analytics	Used for a website's performance and functionality analysis*

* For more information about Google Analytics please visit <https://support.google.com/analytics/answer/6004245?hl=en> and <https://tools.google.com/dlpage/gaoptout/>.

Targeting cookies

Targeting cookies may be set through our site by our advertising partners. They can be used by these third parties to build a profile of your interests based on the browsing information they collect from you. these cookies can be opted out, however If you do not allow these cookies you will still see basic advertising on your browser that is generic and not based on your interests. For example:

Cookie	Type	Origin	Purpose
_fbp	Targeting	Third party - Facebook	Used for marketing campaigns
_utm	Targeting	Third party - Google DoubleClick	Used for marketing campaigns

Cookie setting

You can manage and customize your preferences at any time through the [Cookie Setting tool](#). Alternatively, some web browsers allow control of most cookies through the browser settings. You can delete all cookies that are already on your

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device and you can set most browsers to prevent them from being placed. For further information please visit <https://www.allaboutcookies.org/>. However, please note that blocking or deleting some or all types of cookies may impact your experience of the website and our services.

Links

When you use our websites, you may be able to link to third party websites or apps. This Privacy Policy does not apply to nor endorse those third-party sites or apps, and we are not responsible for any personal information collected and/or processed and/or shared by third parties via those other websites or apps.

Third party sites or apps which have links to iFOREX Europe will govern the use of personal information you submit to them, which may also be collected by cookies when you visit or use them. We do not endorse nor accept any responsibility and/or liability for the privacy practices of such third parties. Other websites and apps have separate and independent privacy policies and therefore we highly recommend you to review the policies and regulations of each site and app you visit before submitting your personal information.

Security

iFOREX Europe makes efforts to maintain appropriate safeguards in order to ensure that the security, integrity and privacy of the personal is not misused. Such measures and safeguards include encryption during information transmission, strong authentication mechanisms and the separation of machines and information to provide secure areas. While such systems and procedures significantly reduce the risk of security breaches and the inappropriate use of personal information, they do not provide absolute security. We will review regularly our security measures in order to effectively eliminate the likelihood of any form of misuse where necessary.

Amendments to policy

In Short: We may update this policy as necessary to stay compliant with relevant laws or when changes in our business conduct occur.

We may change and update the terms of this policy from time to time. All changes will take effect seven (7) days after their initial posting on the Website, unless we amend the privacy policy to comply with legal or regulatory requirements. In the latter cases the amendments will become effective as required, or ordered.

Minors

Our services and website are not available for users under the age of 18 (or the age of legal consent for the jurisdiction the user is located in). We do not knowingly collect personal information from or about minors. If you are a minor, you should not download or use any of our services nor provide any personal information to us. If you have any reason to believe that a minor has shared any information with us, please contact us.

Information Protection Supervisory Authority contact details

iFOREX Europe operates under the supervision of the Office of the Commissioner for Personal Information Protection (“OCPDP”). Should you wish to contact the OCPDP for any purpose, including for the exercise of your rights and/or lodging a complaint, please contact the OCPDP at 1 Iasonos Street, 1082 Nicosia, P.O. Box 23378, CY-1682 Nicosia, Tel. +357 22 818 456, Fax +357 22 304 565 or by e-mail: commissioner@dataprotection.gov.cy.



Governing Law

In respect of issues not addressed in the present Privacy Policy, the law of Cyprus will apply and the competent court for the settlement of any dispute which may arise in respect of this privacy policy shall be the District Court of the district in which the Company's headquarters are located.